



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036

tel: 212-736-4536 fax: 212-947-9512

www.ManhattanCB4.org

JEAN-DANIEL NOLAND

Chair

ROBERT J. BENFATTO, JR., ESQ.

District Manager

October 11, 2007

Mr. Chris Hardej
New York Metropolitan Transportation Council
199 Water Street, 22nd Floor,
New York, NY 10004

Re: Transportation Improvement Program and Conformity Determination

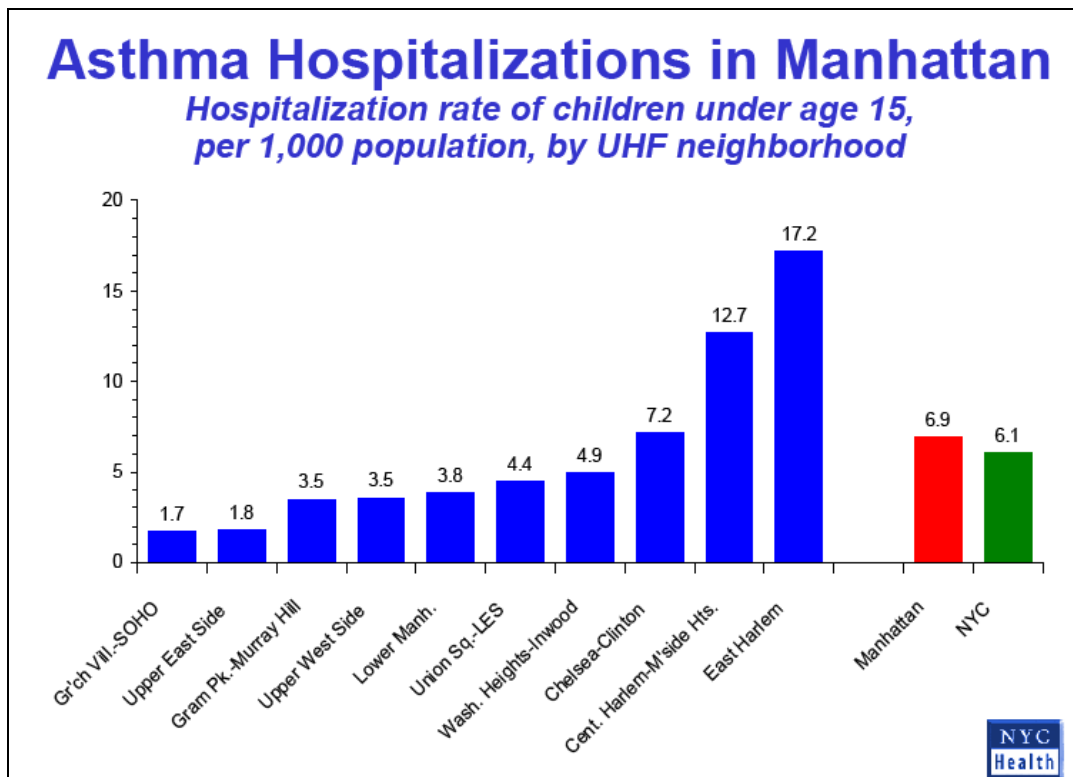
Dear Mr. Hardej,

Manhattan Community Board Four would like to thank the New York Metropolitan Transportation Council (NYMTC) for giving the public the opportunity to comment on the 2008-2012 Transportation Improvement Program (TIP). This letter was sent to you on September 20, 2007 with the approval of the Board's Transportation Committee in order to meet the September 21, 2007 deadline for comments, and has been ratified by the full Board at its meeting on October 3, 2007.

We note that \$ 76 millions in CMAQ funding remain unspent. We request that the following projects to improve air quality and commuter's mobility and safety in our area be included in the FY 2008- 2012 TIP:

1. According to the 2006 Health Department report, CD4 has the second highest rate of asthma hospitalization for children under 15 in Manhattan. However there are no projects to address the clean air issues in this large area of midtown:
 - Just as a Charter Bus garage is being planned in Lower Manhattan to house tourist buses, a Charter Bus Garage should be built to park the hundreds of buses and mini vans idling in our streets. These buses serve the Theater District and Times Square and to lesser extent daily commuters. With the expected increase in bus traffic, this problem will only become more acute. While the Port Authority is studying a new commuter bus garage in midtown, that study's funding and scope does not include a Charter bus garage.
 - An aggressive program of clean diesel conversion of private buses (Charter commuter and commuter vans) should be initiated, modeled after the Hunts Point truck retrofit project. That project has allocated \$ 30 million to retrofit 5,000 trucks. In our case, there are approximately 2,000 buses, and minivans.
 - Four new air measuring equipment towers should be installed on and around 9th Avenue, the Lincoln Tunnel entrances, The Port Authority bus entrances and the New Jersey bus parking lots.

- We are disappointed that the Port Authority of New York and New Jersey has not shared their plans in the same level of details and in the same format. As the Port Authority greatly affects our neighborhood with its projects and the overwhelming presence of diesel buses, we request that NYMTC obtain from the Port Authority and share with the public a detailed plan for the conversion of all buses (commuters and long distance) to clean air technology. The Port Authority must also provide a new parking scheme for the numerous commuter minivans, which idle and park illegally in city bus lanes. The car parking lot on the Port Authority roof presents a viable option to accommodate these vans.



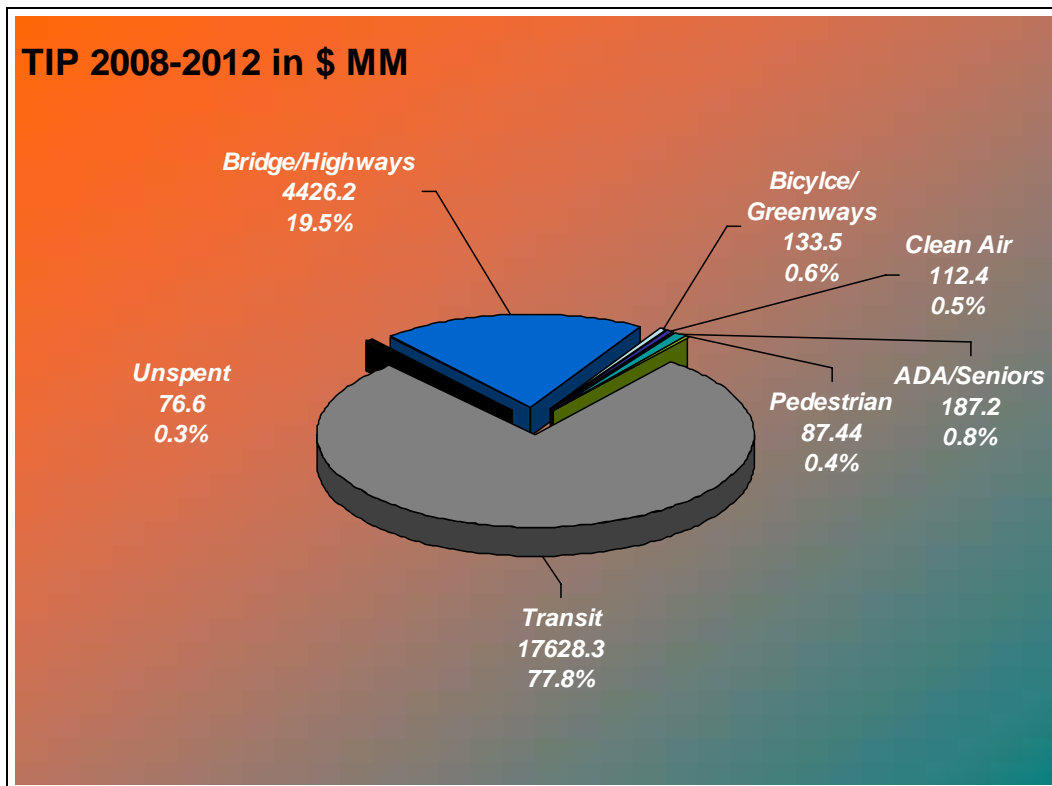
2. We are very pleased that a number of pedestrian safety and traffic calming studies are finally underway in our neighborhood: the Clinton Hell's Kitchen congestion relief and pedestrian safety, the Penn South (senior community) pedestrian safety study, the lower 9th Avenue interim plaza between 14th and 16th streets and the study. These studies will conclude in or before 2010, and \$ 25 million in implementation funds should be blocked in the 2008-2012 TIP so that the projects do not languish five years waiting for the next TIP cycle. This is similar to the \$ 125 million in New York State funds blocked in the plan for future capital projects not yet identified.
3. The recently published truck study highlighted that truck traffic uses 15th street between 5th and 12th Avenues - a residential street with parking on both sides - instead of 14th Street the designated truck route. This street has seen main water pipes breakage, Con Edison fires and other ailments while a main gas pipe is putting the residents' safety at

risk. Funding should be set aside to install all the truck signage required and for an engineering resurfacing study” to evaluate in-depth solutions to safety risks to the residents.

4. The implementation of the new 34th Street New Jersey transit station for the ARC project has identified the widening of Eight Avenue sidewalks between 42nd street and 34th street as one of its required mitigation measures; however, it appears that ARC has no funding for it. Such a project should be included in the plan or prioritized as part of the midtown pedestrianization project.

On the other hand, we question the timing and the spending of \$ 101 million to reinforce bridges on 11th Avenue between 30 and 37th Street to facilitate the building of the West Side Stadium and the Javits Center. The West Side Stadium project died in 2005, and the Javits Center expansion project is increasingly in doubt.

The timing of this project is a major issue as well, as it will interfere with the ARC construction, which is a priority for regional transportation and for congestion relief in our neighborhood. According to the information we received, the ARC project plans to use one lane of traffic on this portion of 11th Avenue for staging. In addition, its main excavation site will be located on 29th Street between 11th and 12th Avenues and the trucks will use 11th Avenue to evacuate the debris. Closing 11th Avenue during this construction would force hundreds of diesel truck trips onto residential streets to reach the Lincoln Tunnel entrances.



While it is encouraging that the overall non- transit budget dedicated to greenway and pedestrian friendly projects continue to increase in New York City , we note that the non

transit portion of the five-year transportation improvement plan still is overwhelmingly focused on the automobile.

By adopting the following suggestions, the portion of the program dedicated to pedestrian (including ADA), bicycle and clean air initiatives could be increased from 2.3% to 11% of the budget. This would better align the TIP with NYC 2030's goal of a congestion-free and transportation friendly New York City.

- a. **Clean Air:** All Buses, BRT and other vehicles to be acquired during the plan should be "Hybrid Clean Air Technology". None of the \$ 1.745 billion in purchases of buses and Para transit vehicles is marked as such. Beyond being clean, these buses are pedestrian friendly, silent with a lower profile on the road. They are also easier to access for handicapped customers.
- b. **Pedestrian safety** deserves more urgency beyond the study undertaken in the plan. Transportation Alternatives has identified a finite number of intersections in New York City that account for 50% of all fatalities and injuries. The \$ 25 million project to make those intersections safe should be included in the plan.
- c. We also question the wisdom of retiming 1503 traffic lights in the city "thereby reducing traffic delays, fuel consumption and air pollution". The air pollution benefits ought to be quantified, versus the corollary increased vehicles speed and the related reduction in pedestrian safety. A better use of funds may be to retime another 1503 traffic lights to provide exclusive phases for pedestrian crossings, therefore reducing the risk of death and injuries.
- d. \$ 33 million in pre 2008 funding allocated to building/renovating private cars **parking** lots in the borough of Manhattan should be redirected to "park and ride" projects on those commuter nodes in proximity of underserved city counties. There is only one such project (Staten Island) in New York city with funding of \$ 9.8 million.
- e. **Complete Streets:** All street, highway and bridge rebuilding, specially the ones leading into Manhattan, should include the creation of an HOV / Bus lane , a buffered bike lane, wider sidewalks, tree planting and ADA compliant pedestrian ramps. There is only \$ 5.45 million in the budget to leverage the capital projects for such purposes. A tenth of one percent, of the \$ 4.4 billion overall budget for Bridges and Highway seems an unduly low percentage considering the overall needs. A 5 % allotment would seem reasonable.

We thank again NYMTC and its member agencies for the opportunity to comment on the plan.

Sincerely,



Jean-Daniel Noland
Chair
Manhattan Community
Board No. 4



Jay Marcus
Co-Chair
Transportation Planning
Committee



Christine Berthet
Co-Chair
Transportation Planning
Committee

J. Barr, NYCDOT
G. Bogacz, NYMTC
J. Ettinger, NYMTC
J. Orcutt, NYCDOT
J. Sadik-Kahn, Commissioner of Transportation
E. Sander MTA
A. Shorris, PANYNJ
L. Venech, PANYNJ

Manhattan Borough President Scott M. Stringer
Senator Thomas Duane
Assembly member Richard Gottfried
Councilmember Christine Quinn
Member of Congress Jerrold Nadler
Councilmember Gale Brewer